

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION

United States of America,

Plaintiff,

v.

Civil No. 19-2257-JPM-cgc

Sixty-Four Thousand Five Hundred Fourteen  
Dollars, Seventeen Cents (\$64,514.17)  
in U.S. Funds from Four (4) Assorted Wells  
Fargo Bank Accounts,

Defendant.

**AFFIDAVIT IN SUPPORT OF MOTION TO ENTER DEFAULT JUDGMENT**

Pursuant to 28 U.S.C. §1746, the undersigned attorney for the plaintiff says:

1. The property due the plaintiff in this action is *Sixty-Four Thousand Five Hundred Fourteen Dollars, Seventeen Cents (\$64,514.17) in U.S. Funds from Four (4) Assorted Wells Fargo Bank Accounts*, more particularly described as follows:

a. Nine Thousand Three Hundred Seventy-Two Dollars, Seventy-Five Cents (\$9,372.75) in U.S. Funds from Account #8886322117 held in the name of Juan Lan Zhen at Wells Fargo Bank;

b. Five Thousand Three Hundred Thirty-Five Dollars, Three Cents (\$5,335.03) in U.S. Funds from Account #8129396274 held in the name of Lucky City, Inc. and Juan Lan Zhen at Wells Fargo Bank;

c. Forty-One Thousand Eight Hundred Ninety-Seven Dollars, Eighty-Three Cents (\$41,897.83) in U.S. Funds from Account #71426882 held in the name of Juan Lan Zhen at Wells Fargo Bank; and,

d. Seven Thousand Nine Hundred Eight Dollars, Fifty-Six Cents (\$7,908.56) in U.S. Funds from Account #3421157979 held in the name of Juan Lan Zhen at Wells Fargo Bank,

2. Default of the defendant and all known claimants for failure to plead or otherwise defend was entered by the clerk for this Court on March 16, 2020.

3. To the best of the affiant's knowledge and belief, all known claimants are not presently in the military service of the United States, and are not infants or incompetent persons.

Under penalty of perjury, the undersigned declares the foregoing to be true and correct.

EXECUTED: This 16<sup>th</sup> day of March, 2020.

/s Christopher E. Cotten  
CHRISTOPHER E. COTTEN  
Assistant United States Attorney